The Hon. Ronald B. Leighton Trial Date: Nov. 5, 2012

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STIPULATION RE: PRE TRIAL DEADLINES - 1

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT TACOMA

TAMARA A. DYKAS,

Plaintiff,

v.

WAL-MART STORES, INC., a corporation doing business in the State of Washington,

Defendant.

Case No. 11-CV-05477-RBL

STIPULATION REGARDING DISCOVERY DEADLINES AND **DISPOSITIVE MOTIONS**

STIPULATION

The parties in the above-entitled and numbered cause, by and through the undersigned attorneys of record, hereby stipulate to extending the following pretrial deadlines. These extensions for filing deadlines are sought due to pending mediation and in an effort to minimize unnecessary expense and time spent regarding litigation of the this matter in light of possible negotiations.

| Description | Date Due | Extension Date |
|---|-----------------|-----------------------|
| EXPERT WITNESS DISCLOSURE | May 9, 2012 | June 11, 2012 |
| DEADLINE FILING OF MOTIONS RELATED TO DISCOVERY | June 18, 2012 | July 18, 2012 |
| DISCOVERY CUTOFF | July 9, 2012 | August 9, 2012 |

LAW OFFICES OF DAVID A. BUFALINI
A PROFESSIONAL SERVICE CORPORATION 2915 N. McCarver Suite 100 Tacoma, WA 98403-3336 Telephone (253) 272-2100

| 1 | DEADLINE FILING DISPOSITIVE MOTIONS | August 7, 2012 | September 7, 2012 |
|---------|--|--|-----------------------------|
| 2 3 | Counsel for the plaintiff and | defendant further certify, as e | evidenced by their |
| 4 | signatures below, that they have disc | cussed the extension of the de | adlines, and all parties |
| 5 | are in agreement with same. | | |
| 6 | | | |
| 7 | May 7, 2012 | LAW OFFICES OF DAVII | A. BUFALINI |
| 8 | | | |
| 9 | | <u>s/David A. Bufalini</u> David A. Bufalini, | WSBA 08262 |
| 10 | | Attorneys for Plaintiffs | |
| 11 | May 7, 2012 | LEE SMART, P.S., INC. | |
| 12 | | | |
| 13 | | s/ David A. Bufalini for | |
| 14 | | Philip B. Grennan, WSBA # Mary DePaolo Haddad, WS | |
| 15 | | Of Attorneys for Defendant | Wal-Mart Store |
| 16 | | ORDER | |
| 17 | THIS MATTER having con | ne before the court on the sti | pulation of the plaintiff |
| 18 | and defendants to allow extension | of the current discovery de | adlines and dispositive |
| 19 | motion deadline, and the court havir | · | - |
| 20 | | | |
| 21 | | discovery deadlines be exten | ded to the agreed dates |
| 22 | referenced in the stipulation adjoine | | |
| 23 | DONE IN OPEN COURT th | nis 8 th day of May, 2012. | |
| 24 25 | | Konali | JB. Leghtun |
| 26 | | Ronald B. Le United States | eighton s District Judge |

STIPULATION RE: PRE TRIAL DEADLINES - 2

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| 1 | Presented by: |
|----|---|
| 2 | LAW OFFICES OF DAVID A. BUFALINI |
| 3 | |
| 4 | /s |
| 5 | David A. Bufalini 8262 Attorney for Plaintiff |
| 6 | |
| 7 | LEE SMART, P.S., INC. |
| 8 | |
| 9 | /s |
| 10 | Philip B. Grennan, WSBA #8127 Mary DePaolo Haddad, WSBA #30604 |
| 11 | Of Attorneys for Defendant Wal-Mart Store |
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